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DISTRICT OF NEVADA	
BY:	DEPUTY

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA** *ORDER*

10 RICHARD WEDDLE,

Case No. 3:16-cv-00634-MMD-CBC

11 Plaintiff,

12 vs.
MOTION FOR EXTENSION OF TIME TO
RESPOND TO DISCOVERY (FIRST REQUEST)

13 ISIDRO BACA, et al.,

14 Defendants.

15 Defendants David Carpenter, Pamela Feil, and Jason O'Dea, by and through counsel, Aaron D.
 16 Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney
 17 General, hereby hereby submit their Motion for Extension of Time to File Responses to Plaintiffs
 18 Discovery requests. (First Request). This Motion is based on Federal Rule of Civil Procedure
 19 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file
 20 in this action.

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 **I. ARGUMENT**

23 Defendants respectfully request a sixty (45) day extension of time out from the current deadline
 24 (August 8, 2019) to respond to Plaintiff's Discovery in this case. Defense counsel submits that this
 25 Division has experienced a wave of recent retirements and departures. Although the Division is
 26 depleted, new Deputy Attorneys General (DAGs) should be arriving in early August to help restore
 27 normal functionality. Defense counsel respectfully requests this extension to accommodate the new
 28 arrivals and the Division during this transition period. Additionally, Counsel is preparing for a Jury

1 Trial in front of Judge Jones which is set to commence on Monday, August 12, 2019, which is further
2 stretching the resources of this office.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

4 When an act may or must be done within a specified time, the court may,
5 for good cause, extend the time: (A) with or without motion or notice if
6 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

7 Defendants' request is timely and will not hinder or prejudice Plaintiff's case, but will allow for a
8 thorough opportunity to respond to the discovery requests. The requested sixty (45) day extension of
9 time should permit the parties time to adequately research draft, and submit discovery in this case.
10 Defendants assert that the requisite good cause is present to warrant the requested extension of time.

11 DATED this 8th day of August, 2019.

12 AARON D. FORD
13 Attorney General

14 By: 

15 DOUGLAS R. RANDS, Bar No. 3572
16 Senior Deputy Attorney General

17 *Attorneys for Defendants*

18 IT IS SO ORDERED
19 
20 U.S. MAGISTRATE JUDGE

21 DATED: 8/8/2019